



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 10 2011

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7009 1680 0000 7672 4609
RETURN RECEIPT REQUESTED

Mr. Jeff Holste
Illinois Environmental Protection Agency
2125 South First Street
Champaign, Illinois 61820

Subject: EPA Oversight Inspection Report

Dear Mr. Holste:

Enclosed, please find a copy of the U.S. Environmental Protection Agency Oversight Inspection Report for the inspection conducted by Illinois Environmental Protection Agency (IEPA) at Rob Wood Farms, Inc. on May 3, 2011. The purpose of the EPA oversight inspection report is to evaluate the IEPA's inspection report from the inspection conducted on May 3, 2011 and subsequent findings at Rob Wood Farms, Inc.

Should you find anything in the report that you disagree with, please provide a detailed response.

Thank you for your prompt attention to this matter. If you have any questions, please contact Don Schwer of my staff at (312) 353-8752.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan J. Bahr", is positioned above the typed name.

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosure
1. Oversight Inspection Report

cc: Bruce Yurdin, IEPA

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

**CWA OVERSIGHT INSPECTION REPORT
ILLINOIS**

The purpose of this document is to provide an evaluation of an Animal Feeding Operation inspection conducted by the Illinois Environmental Protection Agency (IEPA). This evaluation is conducted via comparison to a similar inspection performed by the U. S. Environmental Protection Agency (EPA).

| | |
|-----------------------------|---|
| Inspection facility | Rob Wood Farms, Inc. 31752 N State Route 49 Potomac, IL 61865 |
| NPDES permit status | No permit |
| IEPA inspection date | May 3, 2011 |
| EPA inspection date | September 19, 2011 |

Rob Wood Farms, Inc. is a large CAFO facility located in Potomac, Illinois. IEPA conducted an inspection at the site on May 3, 2011, and found compliance issues (Attachment 1). On September 19, 2011, EPA conducted an inspection at the facility and found similar compliance issues as those indicated in the IEPA report.

Findings from the IEPA inspection are summarized below:

| Area of concern | Identified by IEPA May 3, 2011 |
|---|---------------------------------------|
| Runoff from the facility is not directed to appropriate disposal, holding or storage areas as required, 35 Illinois Administrative Code, Section 501.403(b). | X |
| Compost windrows (manure stacks) were not located such that they prevent runoff from entering surface waters, 35 Illinois Administrative Code, Section 501.404(b)1. | X |
| Runoff discharged from the facility to the surrounding cropland and drainage ways is a threat to cause water pollution, Illinois Environmental Protection Act, Section 12(a). | X |
| Facility threatens to discharge contaminated runoff from the facility into waters of the State without a NPDES Permit, Illinois Environmental Protection Act, Section 12(f). | X |

Inspection Report Sufficiency

| INSPECTION | EVALUATION |
|--|---|
| IEPA inspection May 3, 2011 | The report did not include a narrative description of field activities or sufficient information to support the observations made during the field inspection. To enhance future reports the write up should include a narrative that addresses specific locations and descriptions of the violations noticed, as well as, sampling and photos to support the observations. |

Signature: DR Qu III Date: 9/30/11

Attachment:

IEPA inspection report May 3, 2011.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Livestock Facility Inspection Checklist

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-87.885
051201090504
Vermilion 17183

GENERAL INFORMATION

TYPE OF INSPECTION:

☒ CAFO ☐ COMPLAINT ☐ RECONNAISSANCE ☐ ERU FOLLOW UP ☐ OPERATOR REQUEST ☐ OTHER

FACILITY NAME (LLC, Inc., Corp, Partnership, sole proprietorship, etc.)

Rob Wood Farms, Inc.

INSPECTION DATE

May 3, 2011

ARRIVAL TIME

10:54 am

ADDRESS

31752 North State Route 49

INSPECTOR(s)

J.P. Holste

DEPARTURE TIME

1:30 pm

CITY

Potomac

STATE

Illinois

ZIP CODE

61865

ACCOMPANIED BY (if applicable)

Rob Wood

LEGAL DESCRIPTION

COUNTY

Vermilion

SECTION

35

TOWNSHIP

T22N

RANGE

R14W

TEMPERATURE

50's

PRECIPITATION TYPE

none

Facility Owner(s):

NAME

Rob Wood

CONTACTED

☒ YES ☐ NO

PHONE

MOBILE

Exemption 6 and Exemption 7C

☐ Same as Facility

ADDRESS

Exemption 6 and Exemption 7C

CITY

Exemption 6 and Exemption 7C

STATE

Exemption 6 and Exemption 7C

ZIP CODE

Exemption 6 and Exemption 7C

NAME

CONTACTED

☐ YES ☐ NO

PHONE

MOBILE

ADDRESS

CITY

STATE

ZIP CODE

Facility Operator(s):

NAME

CONTACTED

☐ YES ☐ NO

PHONE

MOBILE

Exemption 6 and Exemption 7C

ADDRESS

CITY

STATE

ZIP CODE

NAME

CONTACTED

☐ YES ☐ NO

PHONE

MOBILE

ADDRESS

CITY

STATE

ZIP CODE

NPDES PERMIT INFORMATION (If no NPDES Permit, skip this section)

1. What type of NPDES permit has been issued?

☐ Individual NPDES Permit

☐ General NPDES Permit

NPDES #

2. What date was the NPDES permit issued?

3. What date does the NPDES permit expire?

4. Is a copy of the NPDES permit onsite?

☐ YES ☐ NO

5. Permitted number of animal units?

6. Does the NPDES Permit contain a compliance schedule?

☐ YES ☐ NO

7. Have there been any changes made to the production area since the permit was issued?

☐ YES ☐ NO

If "YES", provide a detailed description of those changes.

None

Flow to South 0.5 miles to
Isenmiller unnamed trib.
6.12 km/3.8 mi to (Per) Bluegrass Cr
Bluegrass to H.F. Vermilion River

LIVESTOCK FACILITY DESCRIPTION**Facility Type**

- | | |
|--|---|
| <input type="checkbox"/> Total Confinement Buildings | <input type="checkbox"/> Open Earthen Feedlot |
| <input type="checkbox"/> Open Confinement Buildings | <input type="checkbox"/> Vegetated Pasture |
| <input type="checkbox"/> Open Concrete Feedlot | <input type="checkbox"/> Other _____ |

| Type of Animals | Number of Animals (currently) | Capacity | Type of Confinement |
|-----------------|-------------------------------|----------|---------------------|
| BEEF CATTLE | 2000 | 2400 | Roofed open lots |
| | | | |
| | | | |
| | | | |
| | | | |

Does the facility have an Illinois Certified Livestock Manager (300 or greater animal units)? ☐ N/A ☐ YES ☒ NO

If greater than 1000 animal units but less than 5000 animal units, does the facility have a waste management plan? ☐ N/A ☒ YES ☐ NO

If greater than 5000 animal units, has the facility submitted a waste management plan to IDOA for review? ☒ N/A ☐ YES ☐ NO

Does the facility have any other locations under common ownership, or where equipment and/or manure is shared, or where the other site shares land application sites? If so, put names and addresses below.

None

LIVESTOCK WASTE STORAGE

- Does the facility have any existing livestock waste containment system? ☒ YES ☐ NO
If NO, then proceed to question 10.
- General description of the waste containment system (include solid and liquid manure handling, mortality, and feed storage areas).
There are manure storage bunkers between the pens under the roofed structures.
Dead animals are picked up for rendering the next day after death. Facility has an average death loss of 0.56 %

FACILITY WATER SOURCES

1. What type of method is used to provide drinking water for the animals?
☐ Overflow waters ☐ Tip Tanks ☐ Nipple waters ☐ Water Bowls ☒ Other **on-demand concrete tanks**
2. How is the water for animals obtained?
☐ Community PWS ☐ On-Site Well ☐ On-Site Impoundment ☐ Other _____
3. Is a mist cooling system used? ☐ YES ☐ NO
 How is mist water contained?
None

DAIRY OPERATION (If No Dairy, skip this section)

1. How many times per day are cows milked? _____
2. Describe how the dairy's non-contact cooling water is contained (Example: it is reused for drinking water for the animals).
None
3. Describe how the milking parlor is cleaned (hose or flush) and where the process wastewater goes and how it is contained.
None
4. Describe how the tank(s) are washed and where the process wastewater goes and how it is contained.
None
5. Describe where process wastewater from the plate cooler goes and how it is contained.
None

BEDDING (If No Bedding, skip this section)

1. Describe what type of bedding is used for the animals.
They use saw dust and wood chips
2. Describe how bedding is collected and how often.
Bedding that is soiled is place in manure storage structures, clean up performed as needed
3. What is done with the used bedding? ☐ Reused ☒ Land Applied

DISCHARGES

| | | |
|---|------------------------------|--|
| 1. Have there been any documented discharges of livestock waste to surface water <i>in the past year</i> ? If "NO" proceed to question 2. | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| a. If "YES", specify the date(s). | | |
| b. What was the reason for the discharge? | | |
| c. Was the discharge the result of a 25 year-24 hour rainfall event? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| d. What was the precipitation amount? <i>(if applicable)</i> | | |
| e. Was IEMA notified of the discharge? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| f. Has the facility taken corrective action to remedy the situation which caused the discharge(s)? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| If "YES", describe actions taken: None | | |
| 2. Is the facility currently discharging livestock waste from the production area? If "NO" proceed to next section. | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| b. Was the discharge the result of a 25 year-24 hour rainfall event? | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| c. What was the precipitation amount? <i>(if applicable)</i> | | |
| d. What is the reason for the discharge? | | |

OTHER COMMENTS/NOTES

Facility has multiple points in the production area where evidence of runoff during storm events was noted. It would appear that the facility could adjust drainage in the production area and how products are stored, to allow proper handling of any runoff.

It was recommended to Mr. Wood during the inspection that he develop a nutrient management plan that covers all aspects of the facility, not just land application of livestock waste.

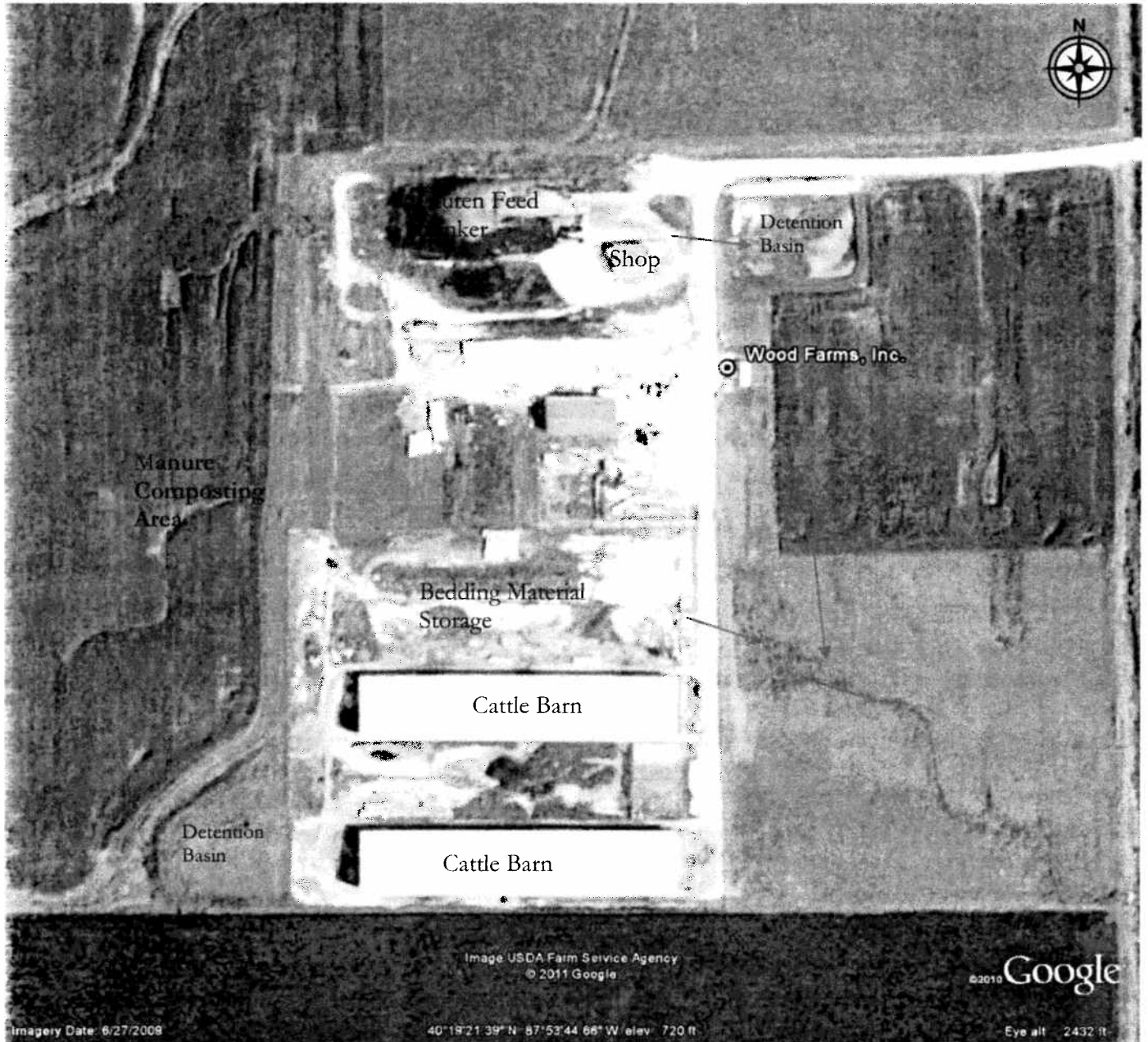
It is recommended that facility be advised to seek permit coverage unless they can demonstrate that all runoff has been adequately addressed and is handled appropriately.

Apparent Violations

- 1. Runoff from the facility is not directed to appropriate disposal, holding or storage areas as required, 35 Illinois Administrative Code, Section 501.403(b)**
- 2. The compost windrows (manure stacks) were not located such that they prevent runoff from entering surface waters, 35 Illinois Administrative Code, Section 501.404(b)1.**
- 3. Runoff discharged from the facility to the surrounding cropland and drainage ways is a threat to cause water pollution, Illinois Environmental Protection Act, Section 12(a).**
- 4. Facility threatens to discharge contaminated runoff from the facility into waters of the State without a NPDES Permit, Illinois Environmental Protection Act, Section 12(f).**

Wood Farms, Inc.
NE ¼ of Section 35 of T.22N.-R.14W.

N40 19.402 W87 53.686



Runoff→

